
STATE OF WYOMING

COUNTY OF BIG HORN

ROCKY MOUNTAIN RECOVERY SYSTEMS, INC.,
A Wyoming Corporation

Plaintiff,

vs.

**KAYTLYN WILSON MARTINEZ AND MATTHEW
MARTINEZ,**

Defendants,

IN THE CIRCUIT COURT
FIFTH JUDICIAL DISTRICT
355 E 5TH
PO BOX 595
LOVELL, WYOMING 82431

Civil Action No. CV-2020-102L

PLAINTIFF'S DISCLOSURES

COMES NOW the above captioned Plaintiff by and through its undersigned attorney and, pursuant to Rule 5 of the Uniform Rules of Civil Procedure for Circuit Courts, discloses the following:

1. Persons with Relevant Information:

- a. Brandi Marsh, CODY REGIONAL HEALTH formerly WEST PARK HOSPITAL, 707 Sheridan Avenue Cody, WY 82414 (307) 527.7501. Testimony will include:
 - i. Laying the foundation for written agreements and business records identifying the terms of the agreement between the defendant, Kaytlyn Wilson Martinez, and West Park Hospital District (now known as Cody Regional Health) dates, types, and charges for the services rendered by the hospital to the defendant as well as any partial payments received.
 - ii. Attesting to the Defendant's and the minor child's (with the initials H.M.) need for the services rendered by the hospital as pertaining to Plaintiff's claims.
 - iii. Attesting to the assignment of these claims from the hospital to the Plaintiff.
 - iv. Interpreting the medical terminology from the records.
 - v. Identifying the hospital's procedures for determining its rates for services, medications and other goods.
- b. Tammy Mattson, ROCKY MOUNTAIN RECOVERY SYSTEMS, INC., 101 Hastings Horseshoe, Powell, Wyoming 82435, (307)754-8215. Testimony will include:
 - i. Laying foundation for the records identifying Plaintiff as a domestic corporation in good standing at all times pertaining to the claims contained herein.

- ii. Laying the foundation for the written agreement for assignment between the Plaintiff and the hospital.
 - iii. Laying the foundation for the business records of the Plaintiff evidencing its efforts seeking to collect these claims without judicial intervention and records of partial payments received, if any.
 - iv. identifying the terms of the agreement between the defendant, Kaytlyn Wilson Martinez, and West Park Hospital District (now known as Cody Regional Health) dates, types, and charges for the services rendered by the hospital to the defendant as well as any partial payments received.
 - v. As a keeper of the records, (s)he will testify about the collections process in general and as applied to this case. This information will support the Plaintiff's position.
- c. Kaytlyn Wilson Martinez, DEFENDANT, 668 Shoshone Ave, Lovell WY 82431, (307) 431-9569. Testimony will include:
- i. Identifying the types of services she received from the hospital as pertaining to Plaintiff's claims.
 - ii. Identifying the individuals who benefited from the hospital's services as pertaining to Plaintiff's claims.
 - iii. Identifying the payment the Defendant made to the hospital for services, if any.
 - iv. Identifying the payment the Defendant made to the Plaintiff for services, if any.
 - v. Identifying the Defendant's familial relationship to the child with the initials H.M.
 - vi. Identifying the Co-Defendant's familial relationship to the child with the initials H.M.
- d. Matthew Martinez, CO-DEFENDANT, 668 Shoshone Ave, Lovell WY 82431, (307) 431-9569. Testimony will include:
- i. Descriptions of the Co-Defendant's observations regarding the services rendered by the hospital to the Defendant and the minor child with the initials H.M. as pertaining to the claims contained herein.
 - ii. Identifying the payments the Co-Defendant made to the hospital for services, if any.
 - iii. Identifying the payments the Co-Defendant made to the Plaintiff for services, if any.
 - iv. Identifying the Co-Defendant's familial relationship to the child with the initials H.M.
 - v. Identifying the Defendant's familial relationship to the child with the initials H.M.

2. Plaintiff hereby certifies that it has the following reasonably available documents available for inspection

and copying:

- a. Printed copies of the hospital's electronic record pertaining to the claims contained herein.
- b. Copies of the agreements between the hospital and the Defendant.
- c. Copies of the assignment agreement between the hospital and the Plaintiff.
- d. Copies of letters mailed by the Plaintiff seeking payment for the claims contained herein.
- e. Printed copy of the Plaintiff's business record as pertaining to the claims contained herein. (8 pages) (Portions of the record pertaining to communications between the Plaintiff and its attorneys and actions taken by the attorneys have been redacted due to Attorney-Client Privilege.

Plaintiff reserves the right to supplement and amend these disclosures as information and facts are discovered.

DATED this 18 day of January 2021.

WILKERSON & WILKERSON LLC

By: 

Bret T Allred
Bar #: 6-3835
210 N. Bent St.
Powell, Wyoming 82435
Phone#: (307) 754-8215

Certificate of Service

I, Bret T. Allred, do hereby certify that on 19 day of January, 2021, I caused the above and foregoing document to be served upon the Defendants by depositing a true and correct copy thereof in the United States mail, postage prepaid, and addressed to the Defendants; *to wit*:

Kaytlyn Wilson Martinez
Matthew Martinez
Attn: Seth Shumaker
2 N Main St E 103
Sheridan WY 82801


Bret T. Allred